

Appl. No. 10/807,474
Client Ref. 50R4671
Docket No. 020699-004620US

Date: March 12, 2008

Appl. No. : 10/807,474
Applicant : SAMRA, et al.
Filed : 03/22/2004
Title : COLLABORATIVE COMPUTER-BASED PRODUCTION
SYSTEM INCLUDING ANNOTATION, VERSIONING AND
REMOTE INTERACTION
TC/A.U. : 2141
Examiner : Kenneth R Coulter
Docket No. : 020699-004620US (50R4671)
Conf. No. : 3062

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Status of Claims

Claims 1-8 and 14-22 are pending in the present application. Claims 9-13 have been cancelled. Claims 1-8 and 14-22 are on appeal.

Grounds of Rejection to be Reviewed on Appeal

1. Whether claim 18 is unpatentable under 35 U.S.C. §112.
2. Whether claims 1-8 and 14-22 are unpatentable over Matsuzawa et al (U.S. Patent No. 6,085,185, hereinafter “Matsuzawa”) under 35 U.S.C. §102(c).

Argument

In the Examiner's answer, the summary of the claimed subject matter was deemed deficient because only a cursory summary was presented. A concise explanation for each independent claim was deemed not present. In a communication mailed May 16, 2007, the summary of the claimed subject matter was deemed deficient because it must identify and map all independent claims on appeal to specification by page and line number or paragraph number and/or drawings, if any. Also, on September 21, 2007, an office communication was mailed that indicated that the summary of the claimed subject matter does not contain a concise explanation of the subject matter. On October 16, 2007, a revised appeal brief was submitted that included a revised summary of the claimed subject matter. Applicants submit the summary includes a concise explanation of the claimed subject matter. In the summary, claims 1, 14, 15, and 19 are described with reference to the specification, page, and paragraph number. The Examiner's answer does not cite what is considered cursory and concise, and what are the exact deficiencies are in the summary. What can be interpreted as cursory and concise is unclear. Applicants submit that the summary of the claimed subject matter summarizes the independent claims in addition to claims 14 and 15 in a concise manner. Also, the page and paragraph number are also provided. If the Examiner is requesting that drawings be cited, even though the "if any" is provided, Fig. 1A may be referred to where annotation markers are shown at 140, 142, 144, 146, 148, 150, 152, and 154. Reels 116, 118, 120, and 122 also include frames. A visual relationship is also shown in Fig. 1A. Thus, the annotation markers that are referred to in the summary of the claimed subject matter can be found in Fig. 1A. Applicants also note that in the summary of claimed subject matter, in reference to claim 15, the applicants have referred to Fig. 1A. Accordingly, applicants, traverse the Examiner's answer indicating that the brief is deficient.

Claims 1 and 19

The Examiner's answer states that when a medium is played, a user generally displays the content of the media object management table 50 on the display device 40. In this case, the user is newly registering an annotation object in the annotation object management table. See Matsuzawa, col. 7, lines 12-15. Annotation

information has not been stored with the selected frame of the production. Because the annotation information has not been registered (i.e., it has not been created yet), Matsuzawa does not disclose or suggest that during playback of the frames in production, an annotation marker showing a visual relationship with the annotation's information relevance to the frame is displayed. Rather, the table is being displayed for the user to enter in information in the table.

Also, the passage referred to in Matsuzawa just discloses that a user may play medium and then the management table is displayed. There is no disclosure or suggestion that the management table is displayed with the medium. Nowhere in Matsuzawa is it disclosed or suggested that both the management table and the medium are displayed concurrently.

Further, a visual relationship of the annotation information's relevance to the frame is not disclosed or suggested by Matsuzawa. The Examiner's answer just states that when a medium is played, a user generally displays the content of the management table. The argument in the Appeal Brief mailed 10/16/07 that Matsuzawa does not disclose or suggest an annotation marker that shows a visual relationship of the annotation information's relevance to the frame is not addressed in the Examiner's answer. Further, a table does not disclose or suggest a visual relationship of the annotation information's relevance to the frame. Applicants submit that the table does not show a visual relationship of the annotation information's relevance to the frame. As described in the specification in paragraphs 31-34, the annotation marker tells a user how the annotation information is intended to relate to the frame underlying the annotation marker displayed. For example, in embodiments of the present invention, the annotation marker may indicate that the annotation information is only relevant to the underlying frame. Also, the annotation marker may indicate that the annotation information may be relevant to the underlying frame and also additional frames, such as frames subsequent to the underlying frame. In one embodiment, the visual information may be a dot with a forward-pointing arrow to indicate that the annotation is pertinent to this frame and onward through the plurality of frames. Other visual relationships may also be

appreciated. Accordingly, Matsuzawa does not disclose or suggest a visual relationship as claimed.

Claim 14

Claim 14 recites the annotation marker is stored as part of the frame in the production. The Examiner's answer cites that the files and memories may be all stored on a hard disk. Applicants submit that this does not disclose or suggest that the annotation marker is stored as part of the frame. Matsuzawa may disclose the files and memories may all be stored on a hard drive, but this does not disclose or suggest that the table is stored as part of the frame.

Claim 15

Claim 15 recites the annotation marker is displayed in the frame being displayed. The Examiner's answer cites that when a medium is played, the contents of the object management table are displayed on display device 40. Nowhere in Matsuzawa is it disclosed or suggested that the table is displayed in a frame of the medium being played. In claim 15, the annotation marker is displayed in the frame of the production. Thus, when the production is played, the annotation marker is displayed as part of a frame of the production. This is shown in Fig. 1A of the application. Matsuzawa just discloses that the table can be displayed but Matsuzawa does not disclose or suggest the table is displayed in a frame in the medium.

Respectfully submitted,

TRELLIS INTELLECTUAL
PROPERTY LAW GROUP, PC

By /Brian N. Young/
Brian N. Young
Reg. No. 48,602
Tel.: 650-842-0300